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United States Coast Guard

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COMDTINST 6260.31
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COMMANDANT INSTRUCTION 6260.31

Subj: SAFETY AND OCCUPATIONAL HEALTH TRAINING REQUIREMENTS FOR OIL SPILL RESPONSE ACTIVITIES

Ref: (a) 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response, NOTAL
(b) COMDTINST 16465.41 (series), District Response Groups/District Response Advisory Teams (DRG/DRAT), NOTAL
(c) COMDTINST M16000.11, (series), Marine Safety Manual, Vol. VI, NOTAL
(d) COMDTINST 16465.47, Pre-Positioned Oil Spill Response Equipment, NOTAL

1. PURPOSE. This instruction establishes safety and occupational health (SOH) training requirements for all units, including Headquarters, area and district units both ashore and afloat, that may respond to discharges of oil into the marine environment and provides guidance on the content and delivery of this training.

2. ACTION. Area and district commanders, commanders of maintenance and logistics commands, and commanding officers of Headquarters units shall ensure compliance with the provisions of this instruction.

3. DISCUSSION.

   a. The Oil Pollution Act of 1990 (OPA 90) requires all Coast Guard personnel to share in the responsibility for responding to oil spills on the navigable waters of the

United States, their adjoining shorelines, and the Exclusive Economic Zone. Personnel involved with pollution response activities may encounter serious SOH hazards when conducting these activities. In addition, the Commandant has directed Coast Guard units to respond aggressively to pollution incidents without endangering personnel.

b. The Occupational Safety and Health Administration (OSHA) also recognized the hazards involved with pollution response activities. In 1990, OSHA issued the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations contained in reference (a) to protect personnel responding to spills of hazardous materials, including oil. These regulations require training to make workers aware of the potential hazards they may encounter and provide the necessary knowledge and skills to perform their work with minimal risk to their safety and health.

c. Coast Guard On-Scene Coordinators are responsible for ensuring compliance with reference (a) as they pertain to oil spill response activities. Lack of compliance with the OSHA regulations may hamper and, on some occasions, halt response operations. As the District Response Group (DRG) is comprised of all Coast Guard personnel and resources, support of the Commandant's direction of aggressive response to pollution incidents will require prudent planning beforehand, including the appropriate level of HAZWOPER training for ALL DRG personnel involved in response operations.

d. HAZWOPER training is federally-mandated and is tiered to address the specific job responsibilities involved with pollution response activities. First responder "Awareness" level training is for those personnel who are likely to witness or discover a pollution incident and initiate a response by notifying the proper authorities. First responder "Operations" level training is intended for personnel who respond to actual or potential oil spills as part of the initial response to the incident. They are trained to respond in a defensive fashion to control the release for the purpose of keeping it from spreading. "Operations" level training includes such topics as hazard awareness, selection and use of personal protective equipment (PPE) based upon unit allowances, basic hazardous materials terminology, spill containment operations (within the capabilities of the resources and PPE available at the unit), basic decontamination procedures, and site safety plan overview. This instruction deals with preparing Coast Guard personnel to perform the tasks associated with "Operations" level training. "Awareness" level training has a much broader applicability within the Coast Guard and will be addressed in a future directive.

4. REQUIREMENTS.

a. Personnel Affected. Coast Guard personnel assigned to multi-mission units engage in emergency first response to oil and hazardous material incidents and are required to comply with the training requirements contained in this instruction. Typical functions considered as first response activities are recognizing unusual circumstances along the waterfront (i.e. pollution), reporting the incident to the appropriate marine safety unit, controlling access to such a site, on some occasions defensively deploying response equipment (e.g. containment boom), and initiating an investigation for civil penalty purposes.

b. HAZWOPER Training Committee (HTC). HTCs shall be established in each district and shall identify multi- mission units within the district that require first response "Operations" level training. Multi-mission units have a limited amount of training time and funding available. The DRG concept is based upon the premise that all personnel and resources may be used to augment Coast Guard forces anywhere within the district as deemed necessary. Consequently, the HTC shall consider the DRG concept, time and funding available to accomplish the training, and the following additional criteria (not all inclusive) when establishing training levels to meet the readiness requirements of paragraph 5.c.:

(1) Volume of commercial tank vessel traffic.

(2) Location and number of petroleum bulk transfer facilities.

(3) Pollution response history in the unit's area of responsibility (AOR).

(4) Station readiness requirements (e.g. multiple boat, single boat).

(5) Proximity of other Coast Guard units or commercial organizations that specialize in pollution response.

(6) Type and availability of pollution response equipment both civilian and military.

The HTC shall incorporate the "Operations" level training requirements into the district standard operation procedures.

c. Minimum Training/Readiness Requirements. As a minimum, multi-mission units (stations and cutters) with significant pollution response potential as identified by the HTC shall have one "Operations" level HAZWOPER trained

boat crew on duty at all times. Units with a lesser response potential shall have a cadre of HAZWOPER trained personnel that can be recalled to respond to pollution incidents in a timely manner.

d. HTC Membership. The HTC shall be chaired by district (mep) and consist of representatives from the District Response Advisory Team (DRAT), (osr), (r), (oan), the MLC (k) safety and environmental health officer assigned to the district, and other representatives from non-district units, as appropiate.

e. Meeting Frequency. The HTC shall initially meet on a quarterly basis to review the readiness posture of the district's pollution response capability. When the training program is institutionalized, the committee may alter this meeting frequency to best suit the needs of the district, but shall meet at least annually.

f. Delivery of Training. The local marine safety office (MSO) shall be responsible for coordinating the required first responder operations level training for all commands within their AOR. In many cases, the local MSO is already active with operational units through field exercises, by providing pollution response training, etc. It is important that the local MSO remain involved in this training effort in order to become familiar with the pollution response capabilities of all units within their AOR. In accordance with references (b) and (c), marine safety units should request assistance in providing this training from the appropriate MLC (k) safety and environmental health officer, assigned to each district. Additional sources of assistance for pollution response training include the cognizant strike team or DRAT. Whenever possible, this training shall be accomplished in conjunction with regularly scheduled unit visits. Additional unit visits solely to conduct HAZWOPER training shall be based upon the availability of sufficient AFC-56 funds. Commandant (G-KSE) will provide each MLC (k) with the necessary lesson plans and training aids to effect this training. The trainer shall provide documentation (e.g. enclosure (1), or similar substitute) for inclusion in the unit's personnel training records.

g. Length of Training.

(1) First responder "Operations" level training will require approximately 8 hours of initial instruction. Refresher training of sufficient content and duration to maintain proficiency in the topics listed in paragraph 4.d shall be performed annually. Training topics should be divided and presented so as not to interfere with unit operations. Additionally, some of the routine operational OJT/PQS training conducted

at field units (boat crew qualification training, first aid, etc.) may fulfill a portion of the required initial and refresher training (see enclosure (1)). Accordingly, all unit training should be recorded in personnel training records. These records shall be reviewed by the HAZWOPER trainer to determine the extent of any additional training necessary.

(2) For Coast Guard and private sector personnel engaged in the post-emergency clean-up and removal of oil, reference (a) requires 40 hours of initial SOH training. Post-emergency clean-up operations are defined as those operations where hazardous substances (oil), are removed, contained, incinerated, neutralized, stabilized, cleared-up or in any other manner processed or handled with the ultimate goal of making the site safer for people or the environment. Personnel having completed Marine Safety Basic Indoctrination Course (MSBIC), Hazardous Chemicals Training Course (HCTC), Marine Safety Petty Officers Course (MSPOC), Port Operations Department Course (PODC), PS "A" School (6/92 to present), Port Safety/Port Security Enlisted Course (PSSE), the Port Safety/Port Security Officer Course (PSSO), the Marine Safety Officer Course (MSOC), and the Port Safety Direct Entry Course (PSDE) have met this training requirement. In addition to these Coast Guard resident courses, 40 hour HAZWOPER training is available from a number of commercial sources. Contact the MLC (k) safety and environmental health officer assigned to each district for information regarding commercial training sources. OSHA has recognized the time critical nature of removing oil from the environment, accordingly, the OSHA Regional Administrator is authorized to reduce the clean-up training requirement to a minimum of 4 hours if no fully trained personnel are available and the respiratory hazard of the spilled product is of "low risk."

(3) In addition to the "Operations" level training, reference (d) requires personnel involved in the operation of the Vessel of Opportunity Skimming System (VOSS) to train on the deployment and operation of this system. Such personnel are encouraged to obtain additional response training in topics such as spill operations (response organization, boom deployment, sorbent use, case documentation, etc.) as well as basic safety operations (hazard communication, thermal stress, buoy deck safety, deck boom safety, hearing conservation, man overboard drills, etc.). Additional information concerning these training

topics can be obtained from the cognizant MLC (k) safety and environmental health officer assigned to each district.

5. RESPONSIBILITIES.

   a. Commandant (G-KSE), in coordination with the appropriate program managers, shall develop and deliver HAZWOPER lesson plans and training aids to each MLC (k).

   b. District commander shall:

      (1) Establish a district HAZWOPER training committee to assess the pollution threat at subordinate commands within the district and determine the required level of HAZWOPER training.

      (2) Coordinate the delivery of the first responder "Operations" level training required by this instruction to all units in their geographical area of responsibility.

      (3) Provide documentation of the HAZWOPER training for inclusion in personnel training records

   c. Commander, maintenance and logistics command shall:

      (1) Appoint a representative for membership on the district HAZWOPER training committee.

      (2) Provide support in delivering the required first responder "Operations" level training to those units identified by the district HAZWOPER training committee.

      (3) Assist requesting commands in the identification or delivery of additional spill response training.

6. FORMS/REPORTS. Routine unit training, as well as the SOH training required by this instruction, may be recorded on the optional form as shown in enclosure (1). This form or equivalent shall be maintained at the unit as a record of training conducted and personnel in attendance. This form may be reproduced locally as needed.

ALAN M. STEINMAN
Chief, Office of Health and Safety

Encl: (1) HAZWOPER Equivalent Training

HAZWOPER EQUIVALENT TRAINING

Use this form to certify equivalent training that can be directly related to hazardous materials emergency response and post- emergency response operations. Maximum equivalent hours are shown in parentheses. Training must directly focus on the specific duties and functions that the responder can reasonably be expected to perform in support of pollution response activities.

NAME:_____ **SSN:**_____

	hours	date	initials
1. First Responder Operations Level Training. (8)	_____	_____	_____
2. Equivalent Training			
a. Hazard Communication (2)	_____	_____	_____
b. Respiratory Protection (2)	_____	_____	_____
c. First Aid (2)	_____	_____	_____
d. Boom Deployment (6)	_____	_____	_____
e. VOSS Deployment (6)	_____	_____	_____
f. Hypothermia (1)	_____	_____	_____
g. Thermal Stress (1)	_____	_____	_____
h. Hearing Conservation (1)	_____	_____	_____
i. Small Boat Handling (4)	_____	_____	_____
j. Crane Operations (4)	_____	_____	_____
k. Confined Space Entry (1)	_____	_____	_____
l. Man Overboard (1)	_____	_____	_____
m. EMT (2)	_____	_____	_____
n. CPR (1)	_____	_____	_____
o. Marine Firefighting (4)	_____	_____	_____
3. Other:			
_____			
_____			
_____			
4. Special Qualifications Training:			
a. MSPOC (40)	_____	_____	_____
b. PODC (40)	_____	_____	_____
c. PS "A" School (40)	_____	_____	_____
d. PSSE Course (40)	_____	_____	_____
e. PSSO Course (40)	_____	_____	_____
f. Buoy Deck Operations (6)	_____	_____	_____
g. Damage Control;			
1. Emergency Party (4)	_____	_____	_____
2. Petty Officer (2)	_____	_____	_____
h. Coxswain (4)	_____	_____	_____
i. Boat Crewman (2)	_____	_____	_____